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October 16, 2020

VIA ECF

Hon. Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Michael Grecco Productions, Inc. v. Alamy Inc. and Alamy Ltd.*, 18-cv-3260-PKC-JO

Dear Judge Chen:

I write on behalf of Plaintiff Michael Grecco Productions, Inc. (“Plaintiff”) in connection with Defendants’ Alamy Inc. and Alamy Ltd. (collectively, the “Defendants”) motion for leave to file documents under seal. (ECF No. 101).

On October 1, 2020, Magistrate Judge Orenstein issued a redacted order granting in part Plaintiff’s motion to compel certain documents previously withheld by Defendants on the basis of an assertion of privilege (the “Order”). (ECF No. 99). Magistrate Judge Orenstein further ordered that an unredacted version of the Order would “be filed under seal (accessible to the defendants but not the plaintiff) and will be unsealed if the decision remains in effect upon the completion of any review.” (*See id.*). Counsel for Defendants have since refused to produce the documents that were the subject of the Order pending their appeal of Magistrate Judge Orenstein’s decision. To that end, Defendants are now seeking leave to file documents under seal in pursuit of that appeal before Your Honor, presumably including objections to the Order.

In the event the Court grants Defendants leave to file their documents under seal, Plaintiff respectfully requests the Court require Defendants to file and serve a redacted version of each, disclosing everything but the specific content of the documents covered by the Order. Absent this directive from the Court, Plaintiff will be left without a meaningful opportunity to respond to Defendants’ objections.

Duane Morris

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Respectfully,

/s/ Steven M. Cowley

Steven M. Cowley

cc: All counsel of record (*via ECF*)